INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

(317) 232-8603
(800) 451-6027
www.state.in.us/idem

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

W. C. Redmon Company
200 Harrison Avenue
Peru, Indiana 46970

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F103-15268-00002	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: Expiration Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) . The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary wood furniture manufacturing plant.

Authorized Individual:	Samuel Redmon
Source Address:	200 Harrison Avenue, Peru, Indiana 46970
Mailing Address:	P.O. Box 7, Peru, IN 46970
SIC Code:	2434
Source Location Status:	Miami
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) Seven (7) spray booths for coating wood furniture, each installed in 1974, each with a maximum capacity of 35.5 wood parts per hour and utilizing air assisted airless spray applicators with particulate matter emissions controlled by dry filters, and each exhausting through one stack respectively identified as B1 through B7;

(b) Seven (7) dip tanks for coating wood furniture, each installed in 1974, all exhausting through one stack DT1;

(c) Woodworking operations controlled by a cyclone and a baghouse in series, exhausting through stack CB1;

(d) Woodworking operations controlled by cyclone # 2, exhausting through stack C2; and

(e) Woodchipping operations controlled by cyclone # 3, exhausting through stack C3.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion units including: eleven (11) space heaters, each with a heat input equal to or less than ten (10) million Btu per hour, with a total heat input capacity of 54.2 MM Btu per hour;

(b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;

(c) Filling drums, pails or other packaging containers with lubricating oils, hydraulic oils, waxes and greases;

(d) Degreasing operation that does not exceed 145 gallons per 12 month period, except if subject to 326 IAC 20-6;

(e) Cleaners and solvents characterized as follows:

(a) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100 F) or;

(b) Having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psi measured at 20 degrees C (68 F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;

(f) Infrared cure equipment;

(g) Any operation using aqueous solutions containing less than 1 % by weight of VOCs excluding HAPs;

(h) Water based adhesives that are less than or equal to 5 % by volume of VOCs excluding HAPs;

(i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;

(j) Paved and unpaved roads and parking lots with public access;

(k) Purging of gas lines and vessels that is related to routing maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;

(l) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;

(m) Blowdown for any of the following: sight glass; boiler; compressors, pumps; and cooling tower;

(n) Emergency Generators as follows:

(a) Gasoline generators not exceeding 110 horsepower;

(b) Diesel generators not exceeding 1600 horsepower;

(o) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM , the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)
or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules [326 IAC 2-8-12(f)].

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement [326 IAC 2-8-8(a)].

(c) Proceedings by IDEM, OAQ , to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable [326 IAC 2-8-8(b)].

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ , may provide a shorter time period in the case of an emergency [326 IAC 2-8-8(c)].

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.10 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) Seven (7) spray booths for coating wood furniture, each installed in 1974, each with a maximum capacity of 35.5 wood parts per hour and utilizing air assisted airless spray applicators with particulate matter emissions controlled by dry filters, and each exhausting through one stack respectively identified as B1 through B7;

(b) Seven (7) dip tanks for coating wood furniture, each installed in 1974, all exhausting through one stack DT1;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4][326 IAC 2-2][40 CFR 52.21]

The total combined VOC input usage at the seven (7) paint booths and the seven (7) dip tanks, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners and VOC solvents, shall be limited to less than 97.63 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit, including the potential to emit for insignificant activities, is required to limit the source-wide potential to emit of VOC to less than 100 tons per year.

Compliance with this limitation shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source. Compliance with this condition shall also make the requirements of 326 IAC 2-2 and 40 CFR 52.21 (PSD), not applicable to the source.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

(a) The total combined input usage of any single hazardous air pollutant (HAP) at the seven (7) paint booths and the seven (7) dip tanks shall be limited to less than 10 tons per twelve (12) consecutive month period . Compliance with this condition shall limit the source-wide potential to emit a single HAP to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The total combined input usage of all hazardous air pollutants (HAPs) at the seven (7) paint booths and the seven (7) dip tanks shall be limited to less than 25 tons per twelve (12) consecutive month period. Compliance with this condition, including the potential to emit of insignificant activities, shall limit the source-wide potential to emit total HAPs to less than 25 tons per 12 consecutive month period with compliance determined at the end of each month.

Compliance with these limitations shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source.

D.1.3 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the seven (7) spary booths shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the spray paint facilities and their control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC and HAP usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.6 VOC and HAP Emissions

Compliance with Conditions D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month based on the respective total volatile organic compound, and single HAP and total HAP usages for the most recent twelve (12) month period.

D.1.7 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d) and in order to comply with D.1.3, the dry particulate filter for particulate control shall be in operation in accordance with manufacturer's specifications and control emissions from the surface coating facilities at all times when the seven (7) spray booths are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (B1 through B7) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.9 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits established in Conditions D1.1 and D.1.2.

(1) The amount, and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The total VOC usage for each month;

(4) The total individual and combined HAP usage for each month;

(5) The weight of VOCs emitted for each compliance period; and

(6) The weight of total individual and combined HAPs emitted for each compliance period.

(b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of daily overspray observations, once per shift and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(c) Woodworking operations controlled by a cyclone and a baghouse in series, exhausting through stack CB1;

(d) Woodworking operations controlled by cyclone # 2, exhausting through stack C2; and

(e) Woodchipping operations controlled by cyclone # 3, exhausting through stack C3.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3][326 IAC 2-2][40CFR 52.21]

Pursuant to 326 IAC 6-3-2 (Process Operations), the following conditions shall apply:

(a) PM emitted from woodworking cyclone # 1, cyclone # 2, and the baghouse each shall not exceed the allowable particulate matter (PM) emission rate of 1.13 pounds per hour when operating at a process weight rate of 293 pounds per hour.

(b) PM emitted from woodchipping cyclone # 3 shall not exceed the allowable particulate matter (PM) emission rate of 1.62 pounds per hour when operating at a process weight rate of 500 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance with these limits shall also limit the source-wide potential to emit of PM to less than 250 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration, PSD) are not applicable.

D.2.2 PM_{10} Emission Limitation [326 IAC 2-8-4][326 IAC 2-2][40CFR 52.21]

PM_{10} emitted from the process operation control devices shall be limited as follows:

(a) The woodworking operations exhausting at stacks CB1 and C2 shall be limited to 7.713 pounds of PM_{10} emitted per ton of wood processed. This is equivalent to 1.13 pounds of PM_{10} per hour, based on a maximum throughput of 0.147 tons per hour.

(b) The woodchipping operations exhausting at stack C3 shall be limited to 6.48 pounds of PM_{10} emitted per ton of wood processed. This is equivalent to 1.62 pounds of PM_{10} per hour, based on a maximum throughput of 0.25 tons per hour.

Compliance with these limitations shall limit the source-wide potential to emit of PM_{10} to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70) are not applicable. Compliance with these requirements shall also make the

requirements of 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration, PSD) not applicable to this source.

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.2.4 Particulate Matter (PM) and PM_{10}

In order to comply with conditions D.2.1 and D.2.2, the baghouse, cyclone # 1, cyclone # 2 and cyclone # 3 for PM and PM_{10} control shall be in operation and control emissions from the woodworking facilities at all times that the woodworking facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.5 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking operations control device stack exhausts (CB1, C2 and C3) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.6 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the woodworking operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.2.8 Cyclone Inspections

An inspection shall be performed each calender quarter of all cyclones controlling the woodworking operations when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.2.9 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.10 Record Keeping Requirements

(a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of each woodworking operations stack exhaust.

(b) To document compliance with Conditions D.2.6 and D.2.8, the Permittee shall maintain records of the results of the inspections required under Conditions D.2.6 and D.2.8 and the dates the vents are redirected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

There are no specific reporting requirements applicable to these facilities.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: W. C. Redmon Company
Source Address: 200 Harrison Avenue, Peru, IN 46970
Mailing Address: P.O. Box 7, Peru, IN 46970
FESOP No.: F103-15268-00002

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: W. C. Redmon Company
Source Address: 200 Harrison Avenue, Peru, IN 46970
Mailing Address: P.O. Box 7, Peru, IN 46970
FESOP No.: F103-15268-00002

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: W. C. Redmon Company
Source Address: 200 Harrison Avenue, Peru, IN 46970
Mailing Address: P.O. Box 7, Peru, IN 46970
FESOP No.: F103-15268-00002
Facility: Seven (7) Paint Booths and Seven (7) Dip Tanks
Parameter: VOC, single and combined HAPs usages
Limit:

(a) total combined VOC input usage at the seven (7) paint booths and seven (7) dip tanks, including but not limited to the usage of sealants, bonding materials, adhesives, caulks, wood stains, paints and undercoatings, ceiling texture, cleaners and VOC solvents, shall be limited to less than 98.43 tons per twelve (12) consecutive month period;

(b) total combined input usage of any single hazardous air pollutant (HAP) at the seven (7) paint booths seven (7) dip tanks shall be limited to less than 10 tons per twelve (12) consecutive month period; and

(c) total combined input usage of all hazardous air pollutants (HAPs) at the seven (7) paint booths seven (7) dip tanks shall be limited to less than 25 tons per twelve (12) consecutive month period.

YEAR: _____

Month	Total Input Usage This Month (tons)			Total Input Usage Previous 11 Months (tons)			Total 12-Month Input Usage (tons)		
	VOC	Single* HAP	Combined HAPs	VOC	Single* HAP	Combined HAPs	VOC	Single* HAP	Combined HAPs
Month 1									
Month 2									
Month 3									

*List the single HAP with the greatest emission rate

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: W. C. Redmon Company
Source Address: 200 Harrison Avenue, Peru, IN 46970
Mailing Address: P.O. Box 7, Peru, IN 46970
FESOP No.: F103-15268-00002

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	**W.C. Redmon Company**
Source Location:	**200 Harrison Avenue, Peru, Indiana 46970**
County:	**Miami**
SIC Code:	**2434**
Operation Permit No.:	**F103-15268-00002**
Permit Reviewer:	**Seema Roy/EVP**

On August 2, 2002, the Office of Air Quality (OAQ) had a notice published in the Peru Tribune, Peru, Indiana, stating that W.C. Redmon Compnay had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a wood furniture manufacturing source. The notice also stated that OAQ proposed to issue a Federally Enforceable State Operating Permit Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On August 9, 2002, Sam Redmon, W.C. Redmon Company submitted comments on the proposed FESOP Renewal. The summary of the comments is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment #1

Please change the mail to address from 200 Harrison Ave to P.O. Box 7, Peru, IN 46970.

Response #1

The following change has been made to A.1.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary wood furniture manufacturing plant.

Authorized Individual:	Samuel Redmon
Source Address:	200 Harrison Avenue, Peru, Indiana 46970
Mailing Address:	~~200 Harrison Avenue, Peru, Indiana 46970~~ **P.O. Box 7, Peru, IN 46970**
SIC Code:	2434
Source Location Status:	Miami
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules: Minor Source, Section 112 of the Clean Air Act

Upon further review, the OAQ has decided to make the following changes to the FESOP Renewal. Bolded language has been added and the language with a line through it has been deleted.

The following updates have been made to incorporate the 326 IAC 6-3 revisions that became effective on June 12, 2002.

1. The following requirement from the previous version of 326 IAC 6-3 (Process Operations) has been approved into the SIP will remain applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action. The following change has been made to clarify that the authority for this condition is from the SIP:

~~D.1.3 Particulate [326 IAC 6-3-2(d)]~~

~~Pursuant to 326 IAC 6-3-2(d), the seven (7) spray booths shall each be controlled by a dry filter, and the dry filters shall be operated in accordance with manufacture's specifications.~~

D.1.3 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to [40 CFR 52 Subpart P], the PM from the seven (7) spary booths shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and

P = process weight rate in tons per hour

2. Previously, the terms "particulate" and "particulate matter" were both used in the rule, but now the term "particulate" is used consistently in 326 IAC 6-3. Also, the revised rule requires particulate from the surface coating processes to be controlled by a dry particulate filter waterwash, or an equivalent control device, and operated in accordance with manufacturer's specifications, therefore, a new condition D.1.7 was added in the permit. Subsequent condition numbers have been changed accordingly.

D.1.7 Particulate [326 IAC 6-3-2(d)]

Pursuant to [326 IAC 6-3-2(d)] and in order to comply with D.1.3, the dry particulate filter for particulate control shall be in operation in accordance with manufacturer's specifications and control emissions from the surface coating facilities at all times when the seven (7) spray booths are in operation.

As a result of the addition of condition D.1.7, the following changes have been made in the permit:

~~D.1.8~~ **D.1.9** Record Keeping Requirements

(b) To document compliance with Condition ~~D.1.7~~ **D.1.8**, the Permittee shall maintain a log of daily overspray observations, once per shift and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	**W.C. Redmon Company**
Source Location:	**200 Harrison Avenue, Peru, Indiana 46970**
County:	**Miami**
SIC Code:	**2434**
Operation Permit No.:	**F103-15268-00002**
Permit Reviewer:	**Seema Roy/EVP**

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from W.C. Redmon Company relating to the operation of a stationary wood furniture manufacturing source. W.C. Redmon Company was issued FESOP 103-7705-00002 on January 21, 1998.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Seven (7) spray booths for coating wood furniture, each installed in 1974, each with a maximum capacity of 35.5 wood parts per hour and utilizing air assisted airless spray applicators with particulate matter emissions controlled by dry filters, and each exhausting through one stack respectively identified as B1 through B7;

(b) Seven (7) dip tanks for coating wood furniture, each installed in 1974, all exhausting through one stack DT1;

(c) Woodworking operations controlled by a cyclone and a baghouse in series, exhausting through stack CB1;

(d) Woodworking operations controlled by cyclone # 2, exhausting through stack C2; and

(e) Woodchipping operations controlled by cyclone # 3, exhausting through stack C3.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emissions Units and Pollution Control Equipment Receiving Advanced Source Revision Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion units including: eleven (11) space heaters, each with a heat input equal to or less than ten (10) million Btu per hour, with a total heat input capacity of 54.2 MM Btu per hour;

(b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;

(c) Filling drums, pails or other packaging containers with lubricating oils, hydraulic oils, waxes and greases;

(d) Degreasing operation that does not exceed 145 gallons per 12 month period, except if subject to 326 IAC 20-6;

(e) Cleaners and solvents characterized as follows:

(1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100 F) or;

(2) Having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psi measured at 20 degrees C (68 F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;

(f) Infrared cure equipment;

(g) Any operation using aqueous solutions containing less than 1 % by weight of VOCs excluding HAPs;

(h) Water based adhesives that are less than or equal to 5 % by volume of VOCs excluding HAPs;

(i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;

(j) Paved and unpaved roads and parking lots with public access;

(k) Purging of gas lines and vessels that is related to routing maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;

(l) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;

(m) Blowdown for any of the following: sight glass; boiler; compressors, pumps; and cooling tower;

(n) Emergency Generators as follows:

(1) Gasoline generators not exceeding 110 horsepower;

(2) Diesel generators not exceeding 1600 horsepower;

(o) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

Existing Approvals

(a) FESOP 103-7705-00002, issued on January 21, 1998.

All conditions from previous approvals were incorporated into this FESOP. However the FESOP limits for VOCs and HAPs. in tons/month, in the existing FESOP has been changed to tons per twelve (12) consecutive month period in order to give more flexibility to the source while remaining in compliance with 326 IAC 2-8-4 (FESOP).

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on January 25, 2002. Additional information was received on June 14, 2002.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 to 8).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	169.6 (less than 250)
PM-10	113.1 (less than 250)
SO_2	1.0 (less than 25)
VOC	241.5 (greater than 100)
CO	22.8 (less than 25)
NO_x	37.0 (less than 100)

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
xylene	greater than 10
ethyl benzene	less than 10
glycol ether	less than 10
toluene	less than 10
TOTAL	greater than 25

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM_{10} and VOCs are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on January 21, 1998, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP (F103-7705-00002; issued on January 21,1998).

	Potential to Emit After Issuance (tons/year)						
Process/emission unit	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Surface Coating (7 Paint Booths +7 Dip Tanks)	5.42(1)	5.42(1)	0.00	<97.63(2)	0.00	0.00	Less than 25 tons/yr for combination and 10 tons/yr for any single
Woodworking (3 controlled facilities)	12.0(1)	12.0(1)	0.00	0.00	0.00	0.00	0.00
Natural Gas Combustion (insignificant activity)	0.4	1.8	0.10	1.3	19.9	23.7	0.00
Emergency Generators (insignificant activity)	0.94	0.94	0.88	1.07	2.86	13.25	0.00
Total PTE After Issuance	18.8	20.2	1.0	<100	22.8	37.0	Less than 25 tons/yr for combination and 10 tons/yr for any single

Notes:
1. Reflects the use of particulate matter control devices which shall be operated at all times the processes are in operation. Assumes all PM equal to PM_{10}.
2. Usage limit required to limit the potential to emit of VOC to less than 100 tons per 12 consecutive month period such that the requirement of 326 IAC 2-7 shall not apply.

County Attainment Status

The source is located in Miami County.

Pollutant	Status
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Miami County has been designated as attainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Miami County has been classified as attainment or unclassifiable for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) (1) The National Emission Standards for Wood Furniture Manufacturing Operations 40 CFR 63, Subpart JJ, does not apply to the seven (7) spray booths because this source will limit single HAP usage to less than 10 tons per year and total HAP usage to less than 25 tons per year.

(2) 40 CFR Part 63, Subpart T (National Emission Standards for Halogenated Solvent Cleaning)

The parts degreasing operation that includes wash tanks with capacities each less than 145 gallons, as an insignificant activity, is not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR 63, Subpart T). Subpart T applies to degreasing operations using one of six listed halogenated solvents, or any combination of the solvents in a concentration greater than 5 percent by weight, as a cleaning or drying agent. The source does not use the regulated halogenated solvents in the degreasing operation; therefore, Subpart T does not apply.

Therefore, there are still no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 61, 326 IAC 20 and 40 CFR Part 63) applicable to this source category.

State Rule Applicability - Entire Source

326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration, PSD)

The existing source was constructed in 1974 prior to the August 7, 1977 rule applicability date. This source is not considered a major source because it is not one of the 28 listed source categories and it has the potential to emit after controls of less than 250 tons per year of any criteria pollutant. As a FESOP source the total input usage of VOC shall be limited to less than 100 tons per year, and the control technology and related compliance requirements for particulates shall limit the potential to emit of PM_{10} (and PM) to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration, PSD) shall not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Miami County which is not one of the specifically listed counties, nor does the source have the potential to emit CO, VOC, NO_x, PM_{10}, or SO_2 in amounts at or exceeding one-hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule the following condition shall apply to this wood furniture manufacturing source:

(a) The amount of VOCs delivered to the applicators plus the amount of VOCs used for clean-up shall be limited to less than 97.63 tons per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 100 tons per 12 consecutive month period with compliance determined at the end of each month. Compliance with this limit shall make 326 IAC 2-7 not applicable.

(b) The amount of any single HAP delivered to the applicators plus the amount of any single HAP used for clean-up shall be limited to less than 10 tons per twelve (12) consecutive month period. The amount of any combination of HAPs delivered to the applicators plus the amount of any combination of HAPs used for clean-up shall be limited to less than 25 tons per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of any single HAP and any combination of HAPs to less than 10 tons and 25 tons, respectively, per 12 consecutive month period with compliance determined at the end of each month. Compliance with this limit shall make 326 IAC 2-7 not applicable.

(c) The total PM_{10} emitted from the source shall be controlled at less than 100 tons per year by complying with the applicable control technology operating, monitoring and record keeping requirements of sections D.1 and D.2.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the following requirements shall apply:

(a) PM emitted from woodworking cyclone # 1, cyclone # 2, and the baghouse each shall not exceed the allowable particulate matter (PM) emission rate of 1.13 pounds per hour when operating at a process weight rate of 293 pounds per hour.

(b) PM emitted from woodchipping cyclone # 3 shall not exceed the allowable particulate matter (PM) emission rate of 1.62 pounds per hour when operating at a process weight rate of 500 pounds per hour.

The pounds per hour limitations for woodworking and woodchipping in (a) and (b) were calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

PM emissions for the woodworking operations are in compliance with 326 IAC 6-3-2 by calculation (See Appendix A, Page 8 of 10). The cyclones and baghouse shall be in operation at all times the woodworking processes and wood chipper are in operation, in order to comply with this limit.

(c) Pursuant to 326 IAC 6-3-2(d), the seven (7) spray booths shall each be controlled by a dry filter, and the dry filters shall be operated in accordance with manufacture's specifications.

326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more, and are not otherwise regulated by other provisions of Article 8. For this source all coating facilities were constructed in 1974. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

Pursuant to 326 IAC 8-2-1 (Applicability) and 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), facilities constructed in a listed county before November 1, 1980, which are located at a source with potential emissions of 100 tons per year or more of VOC, and which meet the criteria of 326 IAC 8-2-12(a), shall comply with the applicable requirements of 326 IAC 8-2-12. Facilities existing in specifically listed counties as of July 1, 1990, or that are newly constructed in any county after July 1, 1990, with actual emissions of greater than 15 pounds of VOC per day before add-on controls, shall likewise comply with the applicable requirements of 326 IAC 8-2-12.

The fourteen (14) wood furniture coating facilities, all constructed in 1974 are not subject to this rule since these facilities are located in Miami County, which is a non-listed county, and has a limited potential to emit of VOC of less than 100 tons per year. Therefore, the requirements of this rule do not apply to these 14 facilities. It is noted that these facilities, nonetheless, utilizes what would otherwise be compliant coating application methods.

326 IAC 8-3-2 (Cold Cleaner Operations)

The source, located in Miami County, is not subject to this rule for the degreasers with capacities less than 145 gallons per 12 month period (as an insignificant activity), since the facilities were constructed in 1974 and the source is not located in one of the specifically listed counties.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources existing as of January 1, 1980, located in Lake and Marion Counties, as well as to facilities commencing operation after October 7, 1974 and prior to January 1, 1980 that are located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source, constructed in 1974 is located in Miami County and, as a FESOP source, shall limit total VOC to less than 100 tons per year. Therefore, this rule does not apply to this source.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. The source is located in Miami County. Therefore, this rule is not applicable to this source.

326 IAC 8-11 (Wood Furniture Coatings)

This rule applies to any person performing wood furniture manufacturing operations in Lake, Porter, Clark, or Floyd County, with the wood furniture manufacturing operations having potential emissions of VOC of 25 tons or more per year and occurring at a source classified with a listed Standard Industrial Classification (SIC) code. This rule is not applicable to this source since it is located in Miami County.

There are no other 326 IAC 8 rules that apply.

Testing Requirements

Testing is not required for the source base on the following reasons:

(a) This source has clear methods of compliance monitoring which can demonstrate compliance with a limit via record keeping and reporting. The coating material usage and related VOC and volatile organic HAP (VHAP) emissions assume an emission factor of 2,000 pounds of pollutant emitted per ton of pollutant input to the coating operation.

(b) The woodworking operations are controlled by baghouse and cyclones with emissions after control well below the allowable particulate matter emission rate.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(1) The seven (7) spray booths have applicable compliance monitoring conditions as specified below:

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (B1 through B7) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the surface coating facilities must operate properly to ensure compliance with 326 IAC 5-1 (Opacity), 326 IAC 6-3-2 (Process Operations), and 326 IAC 2-8-4 (FESOP).

(2) The woodworking processes have applicable compliance monitoring conditions as specified below:

(a) Daily visible emissions notations of the woodworking operations control device stack exhausts (CD1, C2 and C3) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(f) An inspection shall be performed each calender quarter of the baghouse and all cyclones controlling the woodworking operations when venting to the atmosphere. A baghouse and cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

(g) In the event that bag failure has been observed:

(1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(2) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(h) In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

These monitoring conditions are necessary because the baghouse and the cyclones for the woodworking operations must operate properly to ensure compliance with 326 IAC 5-1 (Opacity), 326 IAC 6-3-2 (Process Operations), and 326 IAC 2-8-4 (FESOP).

Conclusion

The renewed operation of this wood furniture manufacturing source shall be subject to the conditions of the attached proposed FESOP No.: F103-15268-00002.

Appendix A: Emission Calculations

Company Name: W.C. Redmon Company
Address City IN Zip: 200 Harrison Avenue, Peru, IN 46970
FESOP Renewal: 103-15268-00002
Reviewer: Seema Roy
Date: May 22, 2002

Uncontrolled Potential Emissions (tons/year)

	Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Emergency Generators	Woodworking	Surface Coating	**TOTAL**
PM	0.40	0.94	59.79	108.46	169.6
PM10	1.80	0.94	1.90	108.46	113.1
SO2	0.10	0.88	negl.	negl.	1.0
NOx	23.70	13.25	negl.	negl.	37.0
VOC	1.30	1.07	negl.	239.10	241.5
CO	19.90	2.86	negl.	negl.	22.8
total HAPs	negl.	negl.	negl.	45.30	45.3
worst case single HAP	negl.	negl.	negl.	34.11	34.1

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)

	Emissions Generating Activity				
Pollutant	Natural Gas Combustion	Emergency Generators	Woodworking	Surface Coating	**TOTAL**
PM	0.40	0.94	12.00	5.42	18.8
PM10	1.80	0.94	12.00	5.42	20.2
SO2	0.10	0.88	negl.	negl.	1.0
NOx	23.70	13.25	negl.	negl.	37.0
VOC	1.30	1.07	negl.	less than 97.63	less than 100
CO	19.90	2.86	negl.	negl.	22.8
total HAPs	negl.	negl.	negl.	less than 25	less than 25
worst case single HAP	negl.	negl.	negl.	less than 10	less than 10

Total emissions based on rated capacity at 8,760 hours/year, after enforceable control and limits.

Appendix A: Emissions Calculations
Natural Gas Combustion
MM BTU/HR <100
Space Heaters

Company Name: W.C. Redmon Company
Address City IN Zip: 200 Harrison Avenue, Peru, IN 46970
FESOP Renewal: 103-15268-00002
Reviewer: Seema Roy
Date: May 22, 2002

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
1.4	12.3

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.0	0.0	0.6	0.0	0.5

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See page 3 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion
MM BTU/HR <100
Space Heaters
HAPs Emissions

Company Name: W.C. Redmon Company
Address City IN Zip: 200 Harrison Avenue, Peru, IN 46970
FESOP Renewal: 103-15268-00002
Reviewer: Seema Roy
Date: May 22, 2002

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.288E-05	7.358E-06	4.599E-04	1.104E-02	2.085E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	3.066E-06	6.745E-06	8.585E-06	2.330E-06	1.288E-05

Methodology is the same as page 2.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
Natural Gas Combustion
MM BTU/HR <100
Space Heaters

Company Name: W.C. Redmon Company
Address City IN Zip: 200 Harrison Avenue, Peru, IN 46970
FESOP Renewal: 103-15268-00002
Reviewer: Seema Roy
Date: May 22, 2002

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
52.8	462.5

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.4	1.8	0.1	23.1	1.3	19.4

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See page 5 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Space Heaters
HAPs Emissions

Company Name: W.C. Redmon Company
Address City IN Zip: 200 Harrison Avenue, Peru, IN 46970
FESOP Renewal: 103-15268-00002
Reviewer: Seema Roy
Date: May 22, 2002

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	4.857E-04	2.775E-04	1.734E-02	4.163E-01	7.863E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.156E-04	2.544E-04	3.238E-04	8.788E-05	4.857E-04

Methodology is the same as page 4.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
Emergency Generators

Company Name: W.C. Redmon Company
Address City IN Zip: 200 Harrison Avenue, Peru, IN 46970
FESOP Renewal: 103-15268-00002
Reviewer: Seema Roy
Date: May 22, 2002

Uncontolled Potential to Emit (tons per year)

Output Capacity Horsepower (hp)	Facility	Potential Throughput hp-hr/yr
110.0	Gasoline Generato	55,000.0
1600.0	Diesel Generator	800,000.0

	Facility	Pollutant					
Emission Factor in lb/hp-hr		PM 0.0022	PM-10 0.0022	SO2 0.0021	NOx 0.031	VOC 0.0025	CO 0.00668
Potential Emissions in tons/yr	Gasoline Generato	0.06	0.06	0.06	0.85	0.07	0.18
Potential Emissions in tons/yr	Diesel Generator	0.88	0.88	0.82	12.40	1.00	2.67
Total Uncontrolled Potential to Emit (tons per year)		0.94	0.94	0.88	13.25	1.07	2.86

Limited Potential to Emit (tons per year)

Output Capacity Horsepower (hp)	Facility	Limited Throughput hp-hr/yr
110.0	Gasoline Generato	55,000.0
1600.0	Diesel Generator	800,000.0

	Facility	Pollutant					
Emission Factor in lb/hp-hr		PM 0.0022	PM-10 0.0022	SO2 0.0021	NOx 0.031	VOC 0.0025	CO 0.00668
Potential Emissions in tons/yr	Gasoline Generato	0.06	0.06	0.06	0.85	0.07	0.18
Potential Emissions in tons/yr	Diesel Generator	0.88	0.88	0.82	12.40	1.00	2.67
Total Limited Potential to Emit (tons per year):		0.94	0.94	0.88	13.25	1.07	2.86

Methodology

Emission Factors are from AP42 (Fifth edition, Suppl. B, October, 1996), Table 3.3-1
Potential Throughput (hp-hr/yr) = hp * 500 hr/yr
Potential Emission (tons/yr) = [Potential Throughput (hp-/hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)
Limited Throughput (hp-hr/yr) = Potential Throughput = hp * 500 hr/yr for both gasoline and Diesel generator
Limited Emission (tons/yr) = [Limited Throughput (hp-/hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

Appendix A: Emission Calculations
Emergency Generators
Haps Emissions

Company Name: W.C. Redmon Company
Address City IN Zip: 200 Harrison Avenue, Peru, IN 46970
FESOP Renewal: 103-15268-00002
Reviewer: Seema Roy
Date: May 22, 2002

HAPs

	Benzene	Toluene	Xylenes	Propylene	1,3-Butadiene
Emission Factor in lb/MMBtu	9.33E-04	4.09E-04	2.85E-04	2.58E-03	3.91E-05
Potential Emission in tons/yr	0.0	0.0	0.0	0.0	0.0

HAPs

	Formaldehyde	Acetaldehyde	Acrolein	Naphthalene	
Emission Factor in lb/MMBtu	1.18E-03	7.67E-04	9.25E-05	8.48E-05	0.00E+00
Potential Emission in tons/yr	0.0	0.0	0.0	0.0	0.0

Methodology

Methodology is the same as page 6 of 10.
Emission Factors are from AP42 (Fifth edition, January 1995, Suppl. B), Table 3.3-2. Conversion factor of 7,000 Btu/hr-hr used to convert from lb/MMBtu to lb/hp-hr.

Appendix A: Woodworking Particulate Emissions

Company Name: W.C. Redmon Company
Address City IN Zip: 200 Harrison Avenue, Peru, IN 46970
FESOP Renewal: 103-15268-00002
Reviewer: Seema Roy
Date: May 22, 2002

Uncontrolled Potential Emissions (tons/year)

A. Baghouse/Cyclone

Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft²)	Total Filter Area (ft²)	Control Efficiency	Total (tons/yr)
CB1	1	0.00130	7.6	3,018	96.00%	27.99

A. Baghouse/Cyclone				
PM10	Units/hr	lb/unit	Control efficiency	Total in tons/yr
	1	0.10000	96.0%	0.5
B. Cyclone # 2				
PM	41	0.01380	93.0%	2.5
PM 10	41	0.00050	0.0%	0.1
C. Cylone # 3				
PM	500	0.01340	93.0%	29.3
PM 10	500	0.00060	0.0%	1.3

Controlled Potential Emissions (tons/year)

A. Baghouses

Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft²)	Total Filter Area (ft²)	Control Efficiency	Total (tons/yr)
CB1	1	0.00130	7.6	3,018	96.00%	1.12

A. Baghouse/Cyclone				
PM10	Units/hr	lb/unit	Control efficiency	Total in tons/yr
	1	0.10000	96.0%	0.0
B. Cyclone # 2				
PM	41	0.01380	93.0%	0.2
PM 10	41	0.00050	0.0%	0.1
C. Cylone # 3				
PM	500	0.01340	93.0%	2.1
PM 10	500	0.00060	0.0%	1.3

Taken from original FESOP 103-7705-00002

Methodology:

Potential (uncontrolled):

Baghouse (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)
Cylone (tons/yr) = (unit/hr)*(lb/unit)*8760 hr/yr* 1 ton/2000 lbs

Potential (controlled):

Baghouse (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * (1-Control Efficiency)
Cylone (tons/yr) = (unit/hr)*(lb/unit)*(1-control efficiency)*8760 hr/yr* 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: W.C. Redmon Company
Address City IN Zip: 200 Harrison Avenue, Peru, IN 46970
FESOP Renewal: 103-15268-00002
Reviewer: Seema Roy
Date: May 22, 2002

Process	Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Spray B 1	Mocha	12.1	18.60%	0.0%	18.6%	0.0%	66.80%	0.07600	20.000	2.24	2.24	3.41	81.76	14.92	16.33	3.36	75%
Spray B 1	Solvent H664 D	6.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.05000	20.000	6.50	6.50	6.50	156.00	28.47	0.00	ERR	75%
Spray B 2	C.F. Blue 2-1222	8.7	40.60%	0.0%	40.6%	0.0%	46.80%	0.07600	20.000	3.52	3.52	5.34	128.26	23.41	8.56	7.51	75%
Spray B 2	Solvent H664 D	6.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.05000	20.000	6.50	6.50	6.50	156.00	28.47	0.00	ERR	75%
Spray B 2	Purple Ash 2-1226	9.7	51.90%	0.0%	51.9%	0.0%	48.00%	0.07600	20.000	5.01	5.01	7.62	182.89	33.38	7.73	10.44	75%
Spray B 2	Burgandy	11.0	21.40%	0.0%	21.4%	0.0%	65.20%	0.07600	20.000	2.36	2.36	3.58	85.95	15.69	14.40	3.61	75%
Spray B 2	Mystic Green	8.7	69.30%	56.9%	12.4%	63.5%	20.90%	0.02700	25.000	2.94	1.07	0.72	17.40	3.17	1.97	5.14	75%
Spray B 2	Herbal Green	11.1	19.80%	0.0%	19.8%	0.0%	67.40%	0.02700	25.000	2.19	2.19	1.48	35.48	6.47	6.56	3.25	75%
Spray B 2	Crystal Pink	12.0	18.10%	0.0%	18.1%	0.0%	67.40%	0.02700	25.000	2.18	2.18	1.47	35.27	6.44	7.28	3.23	75%
Spray B 2	Illusion Blue	12.0	18.10%	0.0%	18.1%	0.0%	67.40%	0.02700	25.000	2.18	2.18	1.47	35.27	6.44	7.28	3.23	75%
Spray B 2	Lavender	12.0	18.10%	0.0%	18.1%	0.0%	67.40%	0.02700	25.000	2.18	2.18	1.47	35.27	6.44	7.28	3.23	75%
Spray B 2	Light Blue 3-454	9.5	57.90%	40.9%	17.0%	46.6%	31.60%	0.02700	25.000	3.01	1.61	1.09	26.08	4.76	2.95	5.09	75%
Spray B 2	Pink 3-453	9.5	57.90%	40.9%	17.0%	46.6%	31.60%	0.02700	25.000	3.01	1.61	1.09	26.08	4.76	2.95	5.09	75%
Spray B 2	Black 2-1235	8.2	44.10%	0.0%	44.1%	0.0%	45.50%	0.07600	20.000	3.60	3.60	5.47	131.28	23.96	7.59	7.91	75%
Spray B 3	White Cap GR-3	12.1	18.20%	0.0%	18.2%	0.0%	67.30%	0.07600	20.000	2.19	2.19	3.33	80.00	14.60	16.41	3.26	75%
Spray B 3	Solvent H664 D	6.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.05000	20.000	6.50	6.50	6.50	156.00	28.47	0.00	ERR	75%
Spray B 4	White Cap GR-3	12.1	18.20%	0.0%	18.2%	0.0%	67.30%	0.07600	20.000	2.19	2.19	3.33	80.00	14.60	16.41	3.26	75%
Spray B 4	White	12.0	18.10%	0.0%	18.1%	0.0%	67.50%	0.05000	30.000	2.18	2.18	3.27	78.39	14.31	16.18	3.23	75%
Spray B 4	Mocha	12.1	18.60%	0.0%	18.6%	0.0%	66.80%	0.07600	20.000	2.24	2.24	3.41	81.76	14.92	16.33	3.36	75%
Spray B 4	C F Blue 2-1222	8.7	40.60%	0.0%	40.6%	0.0%	46.80%	0.07600	20.000	3.52	3.52	5.34	128.26	23.41	8.56	7.51	75%
Spray B 4	Solvent H664 D	6.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.05000	20.000	6.50	6.50	6.50	156.00	28.47	0.00	ERR	75%
Spray B 4	Green W R 3-0487	8.7	68.90%	51.1%	17.8%	54.2%	24.40%	0.07600	20.000	3.37	1.54	2.34	56.23	10.26	4.48	6.32	75%
Spray B 5	White	12.0	18.10%	0.0%	18.1%	0.0%	67.50%	0.05000	30.000	2.18	2.18	3.27	78.39	14.31	16.18	3.23	75%
Spray B 5	Solvent H664 D	6.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.03100	30.000	6.50	6.50	6.05	145.08	26.48	0.00	ERR	75%
Spray B 6	White	12.0	18.10%	0.0%	18.1%	0.0%	67.50%	0.05000	30.000	2.18	2.18	3.27	78.39	14.31	16.18	3.23	75%
Spray B 6	Clear 2-0092 A	7.2	61.70%	0.0%	61.7%	0.0%	33.20%	0.00800	60.000	4.42	4.42	2.12	50.89	9.29	1.44	13.31	75%
Spray B 6	Oak on ash M-6132	6.4	97.50%	0.0%	97.5%	0.0%	1.22%	0.01100	60.000	6.27	6.27	4.14	99.30	18.12	0.12	513.87	75%
Spray B 6	Sandz Rite 648	11.0	20.20%	0.0%	20.2%	0.0%	40.00%	0.00900	80.000	2.22	2.22	1.60	38.40	7.01	6.92	5.56	75%
Spray B 7	Clear 2-0092A	7.2	61.70%	0.0%	61.7%	0.0%	33.20%	0.00800	60.000	4.42	4.42	2.12	50.89	9.29	1.44	13.31	75%
D T 1	Sandz Rite 648	11.0	34.10%	0.0%	34.1%	0.0%	40.00%	0.03500	40.000	3.75	3.75	5.25	126.03	23.00	11.11	9.38	75%
Potential Emissions				**Add worst case coating to all solvents**								**54.60**	**1310.05**	**239.10**	**108.46**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: W.C. Redmon Company
Address City IN Zip: 200 Harrison Avenue, Peru, IN 46970
FESOP Renewal: 103-15268-00002
Reviewer: Seema Roy
Date: May 22, 2002

Process	Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethylbenzene	Weight % Glycol Ethers	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Spray B 1	Mocha	12.1	0.07600	20.000	6.00%	0.00%	1.00%	0.00%	4.81	0.00	0.80	0.00	5.62
Spray B 1	Solvent H664 D	6.5	0.05000	20.000	20.00%	1.00%	5.00%	0.00%	5.69	0.28	1.42	0.00	7.40
Spray B 2	C.F. Blue 2-1222	8.7	0.07600	20.000	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Spray B 2	Solvent H664 D	6.5	0.05000	20.000	20.00%	1.00%	5.00%	0.00%	5.69	0.28	1.42	0.00	7.40
Spray B 2	Purple Ash 2-1226	9.7	0.07600	20.000	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Spray B 2	Burgandy	11.0	0.07600	20.000	7.00%	0.00%	1.00%	0.00%	5.13	0.00	0.73	0.00	5.86
Spray B 2	Mystic Green	8.7	0.02700	25.000	2.20%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Spray B 2	Herbal Green	11.1	0.02700	25.000	7.00%	0.00%	1.00%	0.00%	2.29	0.00	0.33	0.00	2.62
Spray B 2	Crystal Pink	12.0	0.02700	25.000	6.00%	0.00%	1.00%	0.00%	2.13	0.00	0.36	0.00	2.49
Spray B 2	Illusion Blue	12.0	0.02700	25.000	6.00%	0.00%	1.00%	0.00%	2.13	0.00	0.36	0.00	2.49
Spray B 2	Lavender	12.0	0.02700	25.000	6.00%	0.00%	1.00%	0.00%	2.13	0.00	0.36	0.00	2.49
Spray B 2	Light Blue 3-454	9.5	0.02700	25.000	2.15%	0.00%	0.44%	3.25%	0.60	0.00	0.12	0.91	1.64
Spray B 2	Pink 3-453	9.5	0.02700	25.000	2.15%	0.00%	0.44%	3.24%	0.60	0.00	0.12	0.91	1.63
Spray B 2	Black 2-1235	8.2	0.07600	20.000	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Spray B 3	White Cap GR-3	12.1	0.07600	20.000	6.00%	0.00%	1.00%	0.00%	4.81	0.00	0.80	0.00	5.62
Spray B 3	Solvent H664 D	6.5	0.05000	20.000	20.00%	1.00%	5.00%	0.00%	5.69	0.28	1.42	0.00	7.40
Spray B 4	White Cap GR-3	12.1	0.07600	20.000	6.00%	0.00%	1.00%	0.00%	4.81	0.00	0.80	0.00	5.62
Spray B 4	White	12.0	0.05000	30.000	6.00%	0.00%	1.00%	0.00%	4.74	0.00	0.79	0.00	5.53
Spray B 4	Mocha	12.1	0.07600	20.000	6.00%	0.00%	1.00%	0.00%	4.81	0.00	0.80	0.00	5.62
Spray B 4	C F Blue 2-1222	8.7	0.07600	20.000	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Spray B 4	Solvent H664 D	6.5	0.05000	20.000	20.00%	1.00%	5.00%	0.00%	5.69	0.28	1.42	0.00	7.40
Spray B 4	Green W R 3-0487	8.7	0.07600	20.000	3.20%	0.00%	0.00%	0.00%	1.84	0.00	0.00	0.00	1.84
Spray B 5	White	12.0	0.05000	30.000	6.00%	0.00%	1.00%	0.00%	4.74	0.00	0.79	0.00	5.53
Spray B 5	Solvent H664 D	6.5	0.03100	30.000	20.00%	1.00%	5.00%	0.00%	5.30	0.26	1.32	0.00	6.88
Spray B 6	White	12.0	0.05000	30.000	6.00%	0.00%	1.00%	0.00%	4.74	0.00	0.79	0.00	5.53
Spray B 6	Clear 2-0092 A	7.2	0.00800	60.000	8.70%	0.00%	1.90%	0.00%	1.31	0.00	0.29	0.00	1.60
Spray B 6	Oak on ash M-6132	6.4	0.01100	60.000	0.00%	4.30%	0.00%	0.00%	0.00	0.80	0.00	0.00	0.80
Spray B 6	Sandz Rite 648	11.0	0.00900	80.000	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Spray B 7	Clear 2-0092A	7.2	0.00800	60.000	8.70%	0.00%	1.90%	0.00%	1.31	0.00	0.29	0.00	1.60
D T 1	Sandz Rite 648	11.0	0.03500	40.000	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Total Uncontrolled Potential to Emit									**34.11**	**2.20**	**8.08**	**0.91**	**45.30**
Total Limited Potential to Emit									**<10**	**2.20**	**8.08**	**0.91**	**<25**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Total = Worst coating + Sum of all solvents used

Material usage should be limited to less than 29.32% of potential usage based on 8760 hours per year of operation in order to limit xylene emissions to less than 10 tons per year.